

## EXHIBIT 4

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1

2 UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

3 -----x  
4 JENNIFER ECKHART,

5

PLAINTIFF,

6

-against- Index No.:

7

1 : 20-cv-05593

8 FOX NEWS NETWORK, LLC and ED HENRY, in his  
individual and professional capacities,

9

DEFENDANTS.

10

11 -----x  
12 DATE: December 6, 2023  
13 TIME: 10:04 a.m.

14

15 \* \* C O N F I D E N T I A L \* \*

16

17 VIDEOTAPED VIDEOCONFERENCE  
18 EXAMINATION BEFORE TRIAL of BRAD HIRST,  
19 taken by the Plaintiff, held via Zoom,  
before Nicole Veltri, RPR, CRR, a Notary  
20 Public of the State of New York.

21

22

23

24

25

1                   CONFIDENTIAL - B. HIRST

2    retaliation?

3                   MS. MCKENNA: Objection.

4                   Compound, asked and answered. But  
5                   you can answer as to retaliation. I  
6                   think he answered the first question.

7                   A.        Can you repeat the question?

8                   MS. MESIDOR: Could you please,  
9                   Ms. Veltri, could you please repeat  
10                  the question for the witness?

11                  (Whereupon, the referred to  
12                  question was read back by the  
13                  reporter.)

14                  A.        No.

15                  Q.        Who is your current employer?

16                  A.        Fox News Media.

17                  Q.        How long have you worked there?

18                  A.        16 years.

19                  Q.        And when you -- what position  
20                  do you currently hold?

21                  A.        Executive producer of The  
22                  Claman Countdown.

23                  Q.        How long have you been the  
24                  executive producer The Claman Countdown?

25                  A.        Eight years.

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2           Q.        Is that where you met Jennifer  
3           Eckhart?

4           A.        Yes.

5           Q.        Other than within your capacity  
6        as executive producer for The Claman  
7        Countdown, have you worked with Ms. Eckhart  
8        in any other capacity?

9           A.        No.

10          Q.        Were you Ms. Eckhart's direct  
11        supervisor?

12          A.        Yes.

13          Q.        Who else supervised Ms. Eckhart  
14        besides yourself?

15                  MS. MCKENNA: Objection, if  
16        anyone. You can answer the question.

17          A.        I was the sole supervisor.

18          Q.        Ms. Claman did not supervise  
19        Ms. Eckhart?

20          A.        No.

21          Q.        Did Alicia Cascardi supervise  
22        Ms. Eckhart?

23          A.        No.

24          Q.        Who had -- who was charged with  
25        the authority to discipline Ms. Eckhart?

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2                   A.        I was.

3                   Q.        Who was charged to with the  
4        authority to direct Ms. Eckhart's  
5        activities on a day-to-day basis?

6                   A.        That responsibility can be  
7        shared between the senior producer as well  
8        as the executive producer.

9                   Q.        And in the circumstances of  
10      when you and Ms. Eckhart worked together,  
11      who was the senior producer?

12                  A.        Alicia Cascardi.

13                  Q.        And you were the executive  
14      producer; is that correct?

15                  A.        Correct.

16                  Q.        Prior to becoming the executive  
17      producer on The Countdown, what position  
18      did you hold at Fox?

19                  A.        Executive producer of Lou Dobbs  
20      Tonight.

21                  Q.        And how long were you the  
22      executive producer at Lou Dobbs?

23                  A.        I worked on the program for  
24      four years. I was the executive producer  
25      for two years.

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2           Q.       And as -- and how long was she  
3       in the role of a production assistant?

4           A.       I don't know what her length of  
5       time in that role was.

6           Q.       Okay.

7                   Did there come a point when  
8       Ms. Eckhart was promoted?

9           A.       Yes.

10          Q.       What was she promoted to?

11          A.       Booker/researcher.

12          Q.       And when did that promotion  
13       take place?

14          A.       I'm not sure of the exact date,  
15       but within a year of my joining the team.

16          Q.       And was that a merit-based  
17       promotion?

18          A.       Yes.

19          Q.       Did you play a decision -- did  
20       you play a role in the decision to promote  
21       her to booker/researcher?

22          A.       Yes.

23                   MS. MESIDOR: Ms. Veltri, are  
24       you able to hear me okay? I have a  
25       little bit of feedback, and I just

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2    earned it -- she earned the promotion.

3    Q.        Okay.

4                   Do you know how long

5    Ms. Eckhart was in the role of

6    booker/researcher in terms of years?

7    A.        I would have to estimate, but I

8    think it was about two years.

9    Q.        Okay.

10                  And was she promoted again?

11    A.        Yes.

12    Q.        What role was she promoted to?

13    A.        Associate producer.

14    Q.        Okay.

15                  And was that a merit-based

16    promotion?

17    A.        Yes.

18    Q.        And did you have any input into

19    that promotion?

20    A.        Yes.

21    Q.        Can you please describe for me

22    to the best of your recollection the level

23    of input that you had into the decision to

24    make Ms. Eckhart an associate producer?

25    A.        It would be similar to the

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1                   CONFIDENTIAL - B. HIRST  
2   procedures, dealing with human resources to  
3   prepare the paperwork and to make a  
4   decision based on her performance. She was  
5   handling the duties of associate producer  
6   at the time. It's sort of the system that  
7   I have set up for my team to give them  
8   additional responsibilities beyond the  
9   scope of their current title and rank so  
10   that when an opening on the team is  
11   available, they're ready to be promoted to  
12   that position. Someone had left the team.  
13   It created an opening for associate  
14   producer, and Jennifer was ready to take on  
15   that role.

16                Q.    And who else besides yourself  
17   weighed in on the decision to promote  
18   Ms. Eckhart to the associate producer role?

19                MS. MCKENNA: Objection. If  
20   she doesn't rephrase, you should  
21   answer the question.

22                A.    Okay. Alicia Cascardi and Liz  
23   Claman.

24                Q.    And what was the feedback of  
25   Alicia Cascardi regarding Jennifer being

1                   CONFIDENTIAL - B. HIRST  
2   multiple times not to be late to work  
3   anymore.

4                   Q.       And this was all during the  
5   period of the Performance Improvement Plan  
6   that that instruction was given?

7                   MS. MCKENNA: Objection.

8                   A.       Well, it's a standard to keep  
9   track of errors and timeliness.

10                  Q.       That's not my question.

11                  A.       So ask your question again,  
12   please.

13                  Q.       When did human resources give  
14   you the instruction to keep tabs on  
15   Ms. Eckhart?

16                  MS. MCKENNA: Objection.

17                  A.       During our meetings leading up  
18   to and including the PIP.

19                  Q.       When was the first time that  
20   they instructed you or anyone else on your  
21   team to keep tabs on Ms. Eckhart?

22                  MS. MCKENNA: Objection.

23                  A.       In the initial meeting with  
24   Denise Collins, when we began the process  
25   of determining whether Ms. Eckhart needed

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2 Q. Did you ever observe  
3 to have a drinking problem?

4 A. N. O.

5 Q. Did you ever smell alcohol on  
6 ?

7 A. No.

8 Q. Have you been involved in any  
9 investigation into

?

11 MS. MCKENNA: Objection.

12 A. NO.

13 Q. Did there come a point in time  
14 where Ms. Eckhart was terminated?

15 A. Yes.

16 Q. Why was she terminated?

17           A.       For many of the reasons that  
18        we've already discussed, her perennial --  
19        her, I'm sorry, her continuous latenesses,  
20        her failure to show up on time, her failure  
21        to produce our morning production note on a  
22        regular basis, for -- also the reasons that  
23        we discussed with the revelation of the  
24        graphics package, on her social media  
25        accounts, as well as misuse of company

1                   CONFIDENTIAL - B. HIRST  
2 funds to produce the Go Red event tapes for  
3 her own personal -- for her own personal  
4 gain, and multiple editorial errors during  
5 her Performance Improvement Plan.

6                   Q.     Did there come a point in time  
7 in which you heard allegations that  
8 Ms. Eckhart had been raped by Ed Henry?

9                   MR. MANZO: Objection.

10                  MS. MCKENNA: Objection.

11                  A.     About two weeks after she was  
12 terminated.

13                  Q.     How did you learn about the  
14 allegations?

15                  A.     Gary Schreier called me on the  
16 phone to inform me that the lawsuit was  
17 filed.

18                  Q.     What was your reaction?

19                  A.     Shocked and surprised.

20                  Q.     Did you have a discussion with  
21 anyone about Ms. Eckhart's allegations?

22                  A.     Most of my team and my family.

23                  Q.     How many discussions did you  
24 have about Ms. Eckhart's allegations?

25                  A.     It's hard to say. You know,